

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

I. Disposition of Claims

Claims 1-13 are pending in this application. Claims 1, 6, and 10 are independent. Claims 6-9 have been cancelled in this reply. The remaining claims depend, directly or indirectly, from claims 1 and 10.

II. Rejection(s) under 35 U.S.C § 103

Claims 1-13 were rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,222,634 (“Dubbels”) in view of U.S. Patent No. 6,011,905 (“Huttenlocher”). This rejection is respectfully traversed.

Background

It is well known in the art that a printer is a *physical device* that accepts text and graphic output from a computer and transfers the information to a recording medium, *e.g.*, paper. Further, one of ordinary skill in the art will appreciate that printers vary in size, speed, sophistication, and cost. For example, printers have evolved from dot-matrix printers to inkjet printers and laser jet printers.

Typically, printers are physically connected to computers through an input/output (I/O) interface and communicate with the computer through a printer language, *e.g.*,

postscript or printer control language. Typically, a printer receives a print job from a computer and prints images corresponding to the print job. The print job contains the information necessary to print, *i.e.*, the layout, the resolution, the font, the paper size, *etc.* The print job is typically constructed by the computer.

When printing images from the Internet, a print job is typically initiated via a web browser of a computer. The web browser allows an image (or web page) to be selected from a website, which is stored on a server. In the prior art, the web browser of the computer communicates directly with the server, where the website is stored. Once a web page of the website is selected, the web browser also provides functionality for initiating a print job of the image. This print job is sent to the printer, which then prints the image, *e.g.*, on paper.

The Present Invention

In contrast to the prior art, the present invention advantageously provides a printer that may directly access a resource from the Internet, for example, without a computer system facilitating the communication with a server. Additionally, the present invention provides a printer, which has limited memory, with the ability to obtain resources without error.

Specifically, the present invention as recited in the claims relates to a *printer* that includes a first request means, a structural means, a setting means, a second request means, a means for generating print data, and a printing means. The first request means directly makes a first request for obtaining a resource from a server and the structural means determines the structure of the resource based on the response from the server of

the first request. Additionally, the setting means sets the pages to be printed based on the structure of the determined resource. The second request means initiates a second request for obtaining the structural data to be populated within the set pages. Finally, the means for generating print data generates the print data, which is then printed by the printing means. Moreover, the first request means, the structural means, the setting means, the second request means, the means for generating print data, and the printing means are located on the printer.

In contrast to the prior art, the printer of the claimed invention communicates directly with the server. Through direct communication with the server, the printer of the present invention determines the structure of the document, sets the pages to be printed, and populates the set pages, and, finally, prints the data by only designating a uniform resource locator (URL) of a website.

On the other hand, a conventional printer is only in communication with a computer to which it is serially connected (or networked). Thus, structuring the document, setting the pages, and populating the set pages is encapsulated in the print job, which is constructed by the computer. In the prior art, the printer only prints the data according to the print job initiated by the computer.

Dubbels and Huttenlocher

The combination of Dubbels and Huttenlocher does not teach the present invention as recited in claims 1 and 10. In fact, both Dubbels and Huttenlocher are consistent with a conventional printing technique discussed above.

In the final Office Action dated February 4, 2004, it was asserted that “the

apparatus of Dubbels is either a printer or equivalent to a printer since it is being used for printing.” Furthermore, this assertion was based on the description of Dubbels invention as an “Apparatus and method for printing related web pages” and the statement that Dubbels “discloses that his invention comprises a web client print **mechanism** 320 that is used to **print** individual web pages (column 5, lines 26-28).” (emphasis added by Examiner) *See* page 4 of the final Office Action dated February 4, 2004. However, careful review of these statements, together with the remaining disclosure of Dubbels, clearly results in a finding that Dubbels neither discloses a *printer*, nor contemplates any improvement to a *printer*. Thus, Dubbels fails to show or suggest the present invention.

Dubbels teaches *software* for facilitating the printing of multiple web pages, not anything relating to a printer (or printer equivalent) itself. Specifically, the web client print mechanism (320) and the web page print mechanism (128) as taught by Dubbels are both software (or applications) resident in a computer system. As discussed above, it is conventionally known to use software resident in a computer system to format data to be sent to a printer, *i.e.*, data to be “printed.” Moreover, Dubbels makes clear that his invention is involved at the pre-printer processing stages at the outset of his detailed description, explicitly noting that “a computer system 100 in accordance with the present invention includes ... Note that many additions, modifications, and deletions can be made to this computer system 100 within the scope of the invention. Examples of possible additions include: a computer monitor, a keyboard, a cache memory, and peripheral devices such as **printers**.” (emphasis added). Thus, all of the description included in Dubbels is related to functionality of a computer and involves *software* executable thereon. None of the descriptions included in Dubbels relates to a printer

itself or the functionality of a printer.

Further illustration of this fact can be found in the very quotation cited in the final Office Action (column 5, lines 26-28), which states, “the function of the web browser application 210 is described above and is well-known in the art, and includes a web client print mechanism 320 that is used to print individual web pages.” This statement is made in reference to Figure 3. Figure 3 shows a dotted box (320) as a web client print mechanism within a larger dotted box (210) as a web browser application. According to the figure, the web client print mechanism is a component of the web browser application, which is *software*. Thus, the only appropriate conclusion is that the web client print mechanism is also a *software component*. (The Applicant notes that the recitation is the only use of “web client print mechanism.”)

With respect to the “web page print mechanism” as taught in Dubbels, this component also relates to software in a computer system. There are several recitations of “web page print mechanism,” however, all instances of this language point to the “web page print mechanism” being software located in computer system.

The first instance of “web page print mechanism” in Dubbels states, “main memory 120 includes one or more application programs 122, data 124, operating system 126, a web page print mechanism 128, and one or more web pages 130” (col. 3, ll.59-61). Here Dubbels states that the web page print mechanism (128) is stored in the memory of computer system 100. Again, the only appropriate understanding of the term “web page print mechanism” refers to software located on a computer system.

Dubbels continues by stating, “in the present invention, *a computer system 100 includes a web page print mechanism 128* that allows multiple related web pages to be

printed without manually printing each web page. The web page print mechanism of Fig. 1 may exist on a single computer system, as shown in Fig. 5, or may be distributed among multiple computer systems, as shown in Fig. 3" (col. 3, l. 66-col.4, l. 5). In other words, the web page print mechanism is part of the computer system.

In another example, Dubbels states, "While web page print mechanism 128 is shown in Fig. 5 as being separate from web browser 210, in the best mode of the invention it is contemplated that the web page print mechanism 128 will be integrated into a web browser application, thereby providing a browser with advanced web page printing capability. In the alternative, *web page print mechanism 128 may be a separate application running on web client 200, or may be a plug-in or Java applet/application for web browser application 210*" (col. 7, ll. 1-12). Again, the excerpt from Dubbels points directly to the fact that the "web page print mechanism" is a software/application on a computer system. Both the "web client print mechanism" and the "web page print mechanism" are software and not a printer nor an equivalent to a printer.

Finally, Huttenlocher fails to provide that which, as discussed above, Dubbels lacks with respect to the present invention as recited in the claims. Thus, the claims of the present application are patentable over Dubbels and Huttenlocher, whether considered separately or in combination. Accordingly, withdrawal of this rejection is respectfully requested.

"Printing" in Dubbels

In addition to the above, because the web client print mechanism and the web page print mechanism are software, the term "printing" in Dubbels relates to functionality

of the web client print mechanism and the web page print mechanism. In fact, Dubbels states, “selected web page print mechanism 560 takes the web pages selected by the user in the list of related web pages and prints them. The function of these mechanisms may best be understood in relation to flow diagram of Fig. 6.” In the brief description of the drawings, Figure 6 is described as “a flow diagram of the method steps for *printing* related web pages in accordance with the second embodiment,” (col. 2, ll. 39-41). In other words, the term “printing” as used by Dubbels relates to the process carried out by the web page print mechanism, as described in Figure 6. The literal meaning of printing must be understood contextually, thus, “to print” or “printing” as it relates to software is entirely different than “printing” with respect to a physical printer.

Huttenlocher fails to provide that which, as discussed above, Dubbels lacks with respect to the present invention as recited in the claims. Thus, the claims of the present application are patentable over Dubbels and Huttenlocher, whether considered separately or in combination. Accordingly, withdrawal of this rejection is respectfully requested.

Dubbels Teaches Away from the Present Invention

As discussed above, Dubbels does not teach a *printer* having the various means located on the printer, as recited in claims 1 and 10, respectively. The locality of the various means and the modules provides particular advantages, as previously discussed. Namely, having the various means (or modules) located on the printer allows the printer to directly communicate with a server. Therefore, the printer of the present invention is no longer a device that passively receives requests from a computer, but the printer of the present invention is able to directly access a server, thereby obviating the need for a web

browser on a computer system.

Dubbels teaches away from this aspect of the present invention, because Dubbels requires the use of a computer system. Particularly, Dubbels concerns itself entirely with printing related web pages through the use of a computer having a web browser. Thus, for this reason as well, withdrawal of this rejection is respectfully requested.

Summary

A conventional printer passively receives a request from a computer to which it is connected (or networked). The system disclosed by Dubbels performs similarly. The focus of Dubbels teaches novel *software* resident on a computer system, *not* a printer. In contrast, in one or more embodiments, the present invention provides a printer, which directly accesses a server, as recited in claims 1 and 10. Further, the term “print” (and forms thereof) in Dubbels relate to a process executed by the software on the computer system and *not* physically printing. Dubbels is not a physical printer and clearly sets forth this fact in his disclosure.

Further, Dubbels fails to disclose the present invention as described in claims 1 and 10, because Dubbels does not disclose any *printer* having various means (or modules) as required by the claims. Additionally, Dubbels teaches away from the present invention, because Dubbels expressly requires the use of a computer system and one of the primary advantages of the present invention is that the printer does *not* require use of a computer system. Finally, Huttenlocher fails to teach that which Dubbels lacks. Accordingly, independent claims 1 and 10 are patentable over Dubbels and Huttenlocher, whether considered separately or in combination. Thus, dependent claims 2-5 and 11-13

are likewise patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

III. Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 04783/010001).

Respectfully submitted,

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